Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

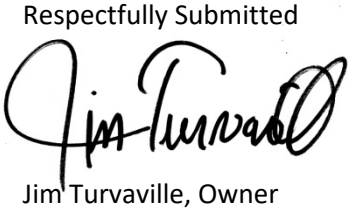
COMMENT:

TTS requests modification of Section 74.1235 which specifies the power limitations for FM translators. The section states *"(a) An application for an FM translator station filed by the licensee or permittee of the primary station to provide fill-in service within the primary station's coverage area will not be accepted for filing if it specifies an effective radiated power (ERP) which exceeds 250 watts..* TTS proposes that this section be amended to permit fill in and white area translators up to 1000 watts ERP or no more than 20% of the primary FM station ERP, as allowed for FM booster stations.

There is no justifiable reason to restrict a translator to 250 watts as long as required interference and separation rules are met at the proposed power. A power increase will make more efficient use of spectrum and provide additional service, particularly for AM stations and FM HD channel rebroadcasts.

A thorough review of this is hereby encouraged.

Respectfully Submitted



Jim Turvaville, Owner
Turbo Technical Services